

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Adv. Pro. No. 08-01789 (SMB)

Plaintiff-Applicant,

SIPA LIQUIDATION

v.  
BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

(Substantively Consolidated)

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Substantively  
Consolidated SIPA Liquidation of Bernard L.  
Madoff Investment Securities LLC and the Estate  
of Bernard L. Madoff,

Adv. Pro. No. 10-04861 (SMB)

Plaintiff,

v.

HAROLD J. HEIN REVOCABLE TRUST;  
RICHARD HEIN, in his capacity as successor  
trustee of the Harold J. Hein Revocable Trust; and  
ROBERT HEIN, in his capacity as successor trustee  
of the Harold J. Hein Revocable Trust,

Defendants.

**STIPULATION EXTENDING TIME TO CONCLUDE MEDIATION**

This Stipulation Extending Time to Conclude Mediation (“Stipulation”) is submitted  
pursuant to the Bankruptcy Court’s Order entered November 10, 2010 (1) Establishing Litigation  
Case Management Procedures for Avoidance Actions and (2) Amending the February 16, 2010  
Protective Order (“Case Management Procedures Order”).

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned herein, that the time by which the Parties must conclude mediation in the above-captioned case is extended up to and including August 27, 2018.

The purpose of this Stipulation is to provide additional time for the Parties to resolve this matter through the mediation process as contemplated under the Case Management Procedures Order.

Except as expressly set forth herein, the parties to this Stipulation reserve all rights and defenses they may have, and entry into this Stipulation shall not impair or otherwise affect such rights and defenses, including without limitation any defenses based on lack of jurisdiction.

This Stipulation may be signed by the parties in any number of counterparts, each of which when so signed shall be an original, but all of which shall together constitute one and the same instrument. A signed facsimile, photostatic or electronic copy of this Stipulation shall be deemed an original.

Dated: April 27, 2018  
New York, New York

*/s/ Nicholas J. Cremona*  
Baker & Hostetler LLP  
45 Rockefeller Plaza  
New York, NY 10111  
Telephone: (212) 589-4200  
Facsimile: (212) 589-4201  
David J. Sheehan  
Email: [dsheehan@bakerlaw.com](mailto:dsheehan@bakerlaw.com)  
Nicholas J. Cremona  
Email: [ncremona@bakerlaw.com](mailto:ncremona@bakerlaw.com)  
Dean D. Hunt  
Email: [dhunt@bakerlaw.com](mailto:dhunt@bakerlaw.com)

*Attorneys for Irving H. Picard, Trustee for the  
Substantively Consolidated SIPA Liquidation  
of Bernard L. Madoff Investment Securities  
LLC and the Estate of Bernard L. Madoff*

*/s/ Carole Neville*  
DENTONS US LLP  
1221 Avenue of the Americas  
New York, NY 10020  
Telephone: (212) 768-6700  
Facsimile: (212) 768-6800  
Carole Neville  
Email: carole.neville@dentons.com

*Attorneys for Defendants*

*/s/ Deborah A. Reperowitz*  
Stradley Ronon Stevens & Young, LLP  
100 Park Avenue, Suite 2000  
New York, NY 10017  
Telephone: (212) 812.4138  
Facsimile: (646) 682.7180  
Deborah A. Reperowitz  
Email: dreperowitz@stradley.com

*Mediator*